

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JANE DOE 1, et al,

Plaintiffs,

vs.

Case No. 2:25-CV-10806

Hon. Mark A. Goldsmith

MATTHEW WEISS; the REGENTS
OF THE UNIVERSITY OF
MICHIGAN; the UNIVERSITY OF
MICHIGAN; KEFFER
DEVELOPMENT SERVICES, LLC,

Defendants.

**DEFENDANT MATTHEW WEISS'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL EXHIBIT REGARDING SERVICE, DEFAULT, AND EXTENSION
CORRESPONDENCE**

This motion seeks leave to file supplemental materials in connection with the pending motions to set aside the Clerk's entry of default (ECF No. 68) and for an extension of time to respond to the consolidated amended complaint (ECF No. 79), which are scheduled for hearing on July 24, 2025.

The proposed exhibit, attached as **Exhibit A**, consists of email correspondence between Defendant and Plaintiffs' counsel from July 17 through July 22, 2025. These communications reflect Defendant's good-faith efforts to resolve outstanding procedural issues - including service, the entry of default, and the appropriate response deadline - through a joint stipulation. As of the time of this filing, Plaintiffs have not responded to Defendant's most recent email sent at 7:19 a.m. on July 22.

The supplemental exhibit is relevant to the pending motions and assists in providing a complete and accurate record for the Court. Specifically, it demonstrates:

- Defendant's good-faith efforts to resolve the procedural matters cooperatively;
- A lack of culpable conduct under Rule 55(c) regarding the default;
- Support for the existence of "good cause" under Rule 6(b) for an extension of time.

This filing introduces no new legal arguments and is offered solely to assist the Court in resolving the procedural issues efficiently at the upcoming hearing.

Pursuant to Local Rule 7.1(a), Defendant conferred with Plaintiffs' counsel through the attached correspondence. Plaintiffs have not responded to the most recent communication. As a pro se litigant, Defendant respectfully requests the Court apply appropriate leniency in construing this motion. Granting this motion will cause no prejudice and will promote judicial efficiency.

Respectfully submitted,

/s/ Matthew Weiss

Pro Se Defendant

2075 W. Stadium Blvd. #1066

Ann Arbor, MI 48106

Dated: July 22, 2025

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2025, I caused a true and correct copy of the foregoing “Motion for Leave to File Supplemental Exhibit Regarding Service, Default, and Extension Correspondence,” along with Exhibit A, to be served via email on the following counsel of record:

Patrick Lannen

Erik Johnson

Parker Stinar

STINAR GOULD GRIECO & HENSLEY, PLLC

patrick@sgghlaw.com

erik@sgghlaw.com

parker@sgghlaw.com

Service was made by email pursuant to Federal Rule of Civil Procedure 5(b)(2)(E) in good faith, as mail might not reach Plaintiffs' Counsel prior to the July 24, 2025 hearing, and based on ongoing electronic correspondence.

Dated: July 22, 2025

/s/ Matthew Weiss

Matthew Weiss

Pro Se Defendant

2075 W. Stadium Blvd. #1066

Ann Arbor, MI 48106